



Georgia-Pacific

Georgia-Pacific Corporation

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April 27, 2006

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CSH

Mr. Jeffrey Inglis
USEPA Region IX
75 Hawthorne Street
San Francisco, California 94105

Dear Mr. Inglis,

In response to the U.S. Environmental Protection Agency's (EPA's) letter to Ms. Mazur and Ms. Walsh dated February 21, 2006, Georgia-Pacific Corporation (GP) provides the following information in consideration of your reassessment of the Current Conditions relative to the 1989 Preliminary Assessment.

The Georgia Pacific Sawmill operations were terminated in November, 2002 at which time GP began a decommissioning process of the lumber mill. All solid and hazardous materials were inventoried and either beneficially reused or disposed of at an approved State of California Department of Toxic Substances Control disposal facility. During this removal and disposal process, the Mendocino County Environmental Health Department periodically reviewed and approved all activity via onsite meetings and updates to the Hazardous Material Business Plan.

In preparation for sale a Phase I Environmental Assessment (EA) was performed to determine potential Areas of Concern (AOC) as well as Chemicals of Potential Concern (COPC) in 2003. Subsequent to the Phase I, a Phase II (with additional assessments) was initiated in July of 2003. GP met with the North Coast Regional Water Quality Control Board (Water Board) to share our findings of the Phase II EA. The Water Board's Staff Report to the Executive Director best describes the findings at that time as a "Petroleum Site". In 2005, two work plans were developed and approved by the Water Board. One, *Workplan for Additional Site Assessment*, dated June 8, 2005, is intended to complete the delineation of the known contamination and assess other AOCs that had been brought to GP's and the Water Board's attention. The field work for this assessment was initiated and is near completion. The second, *Workplan for Foundation Removal, Additional Assessment and Interim Remedial Measures*, is intended to complete the assessment. This scope of work which was developed to support a Coastal Development Permit (CDP) application is currently pending and is set for a *de novo* hearing by the California Coastal Commission (CCC) in May of 2006. We hope to begin this work at the end of May of 2006. Concurrent with this work GP will be working with the Water Board to evaluate any data gaps from all previous assessments to insure that the site has been fully characterized.

Once the site has been completely characterized, the data obtained will be utilized to perform a Human Health and Ecological Risk Assessment (HHERA) under the direction of the Water Board and Office of Environmental Health Hazard Assessment (OEHHHA). This is anticipated to be completed in the spring of 2007. Once this is completed and approved by OEHHHA, a Feasibility Study/ Remedial Action Plan (FS/RAP) will be developed.

Thirty **groundwater** monitoring wells were installed as a part of the initial Phase II EA and quarterly monitoring has been performed since the third quarter of 2004. Ten additional wells as well as sampling at the stormwater outfall and the seep have been added to the network as a part of

the current assessment activities. For your review of groundwater quality characteristics, please access the Water Board's web site: www.waterboards.ca.gov/northcoast/geninfo/gp/gp.html. The quarterly monitoring results as well as work plans, environmental assessment, and results from the Biological, Geotechnical and Archaeological assessments can be also found on this web site.

To date, the results of the groundwater monitoring indicates limited impacts to groundwater, which are generally associated with former vehicle fueling and maintenance areas. Measurable thicknesses of liquid phase hydrocarbons are limited to one of the monitoring wells, with a maximum observed thickness of less than 0.1 foot. Reported concentrations of fuel hydrocarbons, volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), polynuclear aromatic hydrocarbons, and polychlorinated biphenyls are less than the method detection limit in samples from most of the monitoring wells. Historically, fuel hydrocarbons and a few VOCs and SVOCs associated with motor fuels have been reported above the method detection limit in no more than six of the wells. Observed concentrations are consistent with dissolved-phase impacts from older releases. Observed concentrations of chlorinated VOCs are typically less than 10 micrograms per liter, and most appear to be associated with off-site sources.

Stormwater/Wastewater, as stated in the 1989, EPA Preliminary Assessment, stormwater is directed to the former sawmill's series of settling and aeration ponds on site. Forty percent of the city's Stormwater runoff is discharged into the Log Pond. Process wastewaters consisted of boiler wet scrubber water, boiler blowdown and minor amounts of Stormwater. In 1983 it was determined that levels of cyanide in the wastewater discharge exceeded permitted levels. Improvements to their wastewater treatment system helped to reduce the amount of cyanide in the wastewater discharge. As a condition of the wastewater permit the facility was required to obtain monthly grab samples for fish bioassays. Analytical data from this monthly bioassay indicated that there was no negative affect shown to occur in the fish.

Under the Monitoring and Reporting Program (3/22/2001) overseen by the Water Board, Cyanide was sampled weekly and Ammonia, Turbidity, pH and Settlement Solids were sampled monthly. On a semi annual basis, grab samples for fish bioassay along with samples for analysis metals, total phenols, oil and grease and suspended solids were collected. Only one semi annual event was performed prior to G-P's request to rescind the permit since we no longer discharged waste water. At the time of the decommissioning of the mill, the mill was operating as a minor discharger under Order No.; R1-2001-22 and NPDES Permit No. CA 0005304 including Waste Discharge Requirements which met the water quality objectives of the "Basin Plan" and for the "Water Quality Control Plan for Ocean Waters of California". Effluent limitations were not to exceed Table A and B constituents of the Ocean Plan. The Water Board rescinded these permits on June 30, 2004. GP will maintain a general stormwater permit until all demolition and future remedial activities are completed.

The GP facility began to burn demolition wood waste as fuel for the facility's three industrial boilers from July 1, 2000 – August 31, 2001. On July 17, 2001 GP conducted a stack test on the number 3 boiler as required by the Title V air permit for particulate matter, CO and NOx. The test results indicated that the emissions from this unit were less than one-half of the permitted level. On January 28, 2002, GP informed the Mendocino County Air Quality Management District that demolition wood waste would not be a source a fuel for the three industrial boilers. The mill had a difficult time in tracking the material and the material received was inconsistent. The Title V permit was amended on May 20, 2002 by the District to remove all language referencing the use of

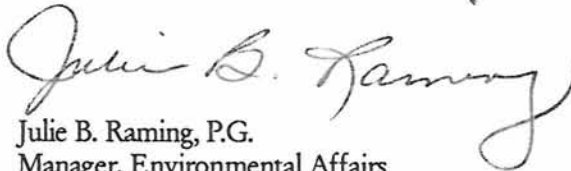
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demolition wood waste at the site. GP requested termination of the Title V Permit on February 17, 2002, and the permit was canceled effective July 1, 2003. Contrary to the false assertions by North Coast Action, GP shut down the boilers in 2002 as they were decommissioning the Mill.

The allegations set forth in the North Coast Action and Sierra Club, Mendocino Chapter (Collectively NCA), January 30, 2006 correspondence to Mr. Wayne Nastri, EPA have been directed to other agencies, including the Water Board. GP has made every effort to determine the validity of any of the allegations brought to GP's or the Water Board's attention by including these alleged AOCs in the on-going assessment activities. However, many of these allegations are based on unsubstantiated "anonymous testimonies" and the data collected to date does not support them.

Based on prior and ongoing monitoring and the current assessment efforts, there are no conditions warranting emergency response under the Comprehensive Environmental Response, Compensation and Liability Act at the GP Fort Bragg Mill Site. If you should have any questions or need additional information, please feel free to contact me at (404) 652-6869 or via e-mail at jbraming@gapac.com/

Sincerely,



Julie B. Raming, P.G.
Manager, Environmental Affairs
Georgia Pacific Corporation

Cc: Ms. Denise M. Klimas, NOAA

Dr. Craig Hunt, NCRWQCB